

STIPULATION AND PROPOSED ORDER

IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, by and among the undersigned counsel to plaintiffs Debra Hall and David Salkin, and defendants Ezra Dabah and Hiten Patel (the "Defendants"), as follows:

- 1. A consolidated and amended complaint shall be filed 60 days after lead plaintiff is chosen;
- 2. Defendants have until 60 days thereafter to file a motion to dismiss the consolidated amended complaint;

- 3. Any opposition to the motion to dismiss shall be filed 45 days after the filing of the motion to dismiss; and
- 4. Defendants shall submit their reply, if any, within 30 days after the filing of the opposition to the motion to dismiss.

Dated: November 1, 2007 New York, New York

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SO ORDERED

The Honorable Shira A. Scheindlin

United States District Judge